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REMARKS

Claims 1-12, 15-16, and 19-20 are all the claims presently pending in the application. Claims 1, 5, 7, 15, and 19-20 are amended to more clearly define the invention and claims 13-14, 17-18, and 21-28 are canceled. Claims 1, 5, 7, and 15 are independent.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicants also note that, notwithstanding any claim amendments herein or later during prosecution, Applicants' intent is to encompass equivalents of all claim elements.

Entry of this §1.116 Amendment is proper. Since the Amendments above narrow the issues for appeal and since such features and their distinctions over the prior art of record were discussed earlier, such amendments do not raise a new issue requiring a further search and/or consideration by the Examiner. As such, entry of this Amendment is believed proper and Applicant earnestly solicits entry. No new matter has been added.

Applicants gratefully acknowledge that claims 3-4, 6, 10-12, 20, and 25-28 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. However, Applicants respectfully submit that all of the claims are allowable.

Claims 1, 5, 7, 13-15, 17-19, and 21-25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the Derleth et al. reference (U.S. Patent No. 6,234,569). Claims 1-2, 5, 7-8, and 13-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the Lindberg et al.

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reference (U.S. Patent No. 6,073,987). Claims 7, and 9 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the Lorenz et al. reference (U.S. Patent No. 4,733,739).

These rejections are respectfully traversed in the following discussion

I. THE CLAIMED INVENTION

A first exemplary embodiment of the claimed invention, as defined by claim 1, is directed to a blower unit mounting structure that includes an instrument panel including an upper panel and a lower panel that are vertically divided along a transverse direction of a vehicle body; a steering support beam fixed to the lower panel, and a blower unit fixed to the lower panel and the steering support beam to form a unitized component.

A second exemplary embodiment of the claimed invention, as defined by claim 5, is directed to a method for mounting a blower unit. The method includes preparing an instrument panel including an upper panel and a lower panel that are vertically divided along a transverse direction of a vehicle body, forming a unitized component by connecting a steering support beam to the lower panel and connecting a blower unit to the lower panel, mounting the unitized component on the vehicle body after forming the unitized component, and mounting the upper panel to the vehicle body after mounting the unitized component on the vehicle body.

A third exemplary embodiment of the claimed invention, as defined by claim 7, is directed to a blower unit mounting structure that includes an instrument panel including an upper panel and a lower panel, a steering support beam connected to the lower panel, and a blower unit connected to the steering support beam and the lower panel.

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A fourth exemplary embodiment of the claimed invention, as defined by claim 15, is directed to a method for mounting a blower unit on a vehicle body. The method includes preparing an instrument panel including an upper panel and a lower panel, forming a unitary component by connecting the lower panel to a steering support beam and a blower unit, connecting the blower unit to the steering support beam, and mounting the unitized component on the vehicle body after forming the unitary component.

Conventionally vehicles having a transversely extending steering support beam have had their blower units mounted to the steering support beam only after the steering support beam was mounted on the vehicle body. However, this causes great difficulty when mounting the blower unit in the vehicle in a narrow passenger compartment.

In particular, when fastening the blower unit to the toe board, the mechanic is forced to do the fastening work from below the steering support beam in an uncomfortable posture. This causes an increase in the risk of mounting inaccuracy.

Additionally, it has been very difficult to fasten the blower unit, which has been incorrectly fastened to the toe board, to fasten the blower unit to the instrument panel.

In stark contrast, the present invention provides an instrument panel that includes a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. By dividing the instrument panel into an upper panel and a lower panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line

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23). Rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

II. THE PRIOR ART REJECTIONS

A. The 102(e) Derleth et al. reference rejection

Regarding the rejection of claims 1, 5, 7, 13-15, 17-19, and 21-25, the Examiner alleges that the Derleth et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Derleth et al. reference.

The Derleth et al. reference does not teach or suggest the features of the present invention including a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

Rather, the Derleth et al. reference specifically discloses attaching the blower unit only

after attaching the cross member 72 into the vehicle (col. 6, lines 30-40). Therefore, the Derleth et al. reference actually suffers from a problem that is solved by the present invention. The Derleth et al. reference suffers from the problem of forcing a mechanic to install the blower unit in a narrow passenger compartment from below. Thus, the Derleth et al. reference discloses the very difficult task of mounting a blower unit in a narrow space in an uncomfortable position.

Indeed, the Derleth et al. reference decorative covers 60 and 98 (corresponding to the steering support beam and the blower unit) are attached on the vehicle only after a subassembly 10 is attached on the vehicle. Therefore, the Derleth et al. reference does not teach or suggest a a unitized component that includes a blower unit fixed to the lower panel and the steering support beam.

In summary, the Derleth et al. reference does not teach or suggest forming the unitized component. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

Therefore, the Derleth et al. reference does not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this

rejection of claims 1, 5, 7, 13-15, 17-19, and 21-25.

B. The 102(e) Lindberg et al. reference rejection

Regarding the rejection of claims 1-2, 5, 7-8, and 13-19, the Examiner alleges that the Lindberg et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Lindberg et al. reference.

The Lindberg et al. reference does not teach or suggest the features of the present invention including a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the lower panel of the instrument panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

The Lindberg et al. reference appears to disclose an instrument panel 30 that includes a base module 32 that has an intermediate plenum bottom 36 and a platform 38. The intermediate plenum bottom 36 and the platform 38 are formed of a structurally rigid material (col. 3, line 65 - col. 4, line 17; col. 6, lines 56-59; and col. 7, lines 54-61). A steering column support 50 may be

mounted to the platform 38 (col. 4, lines 34-39).

However, in stark contrast to the present invention, the Lindberg et al. reference does not teach or suggest a unitized component that includes a blower unit fixed to the lower panel and the steering support beam.

Rather, the knee bolster 258 and the bezel 256 (which the Examiner contends corresponds to the claimed lower panel) is clearly not directly connected to the steering column support 50 (which the Examiner alleges corresponds to the claimed steering support beam). As described in the Lindberg et al reference, the steering column support 50 is directly connected to the platform 38 (col. 7, line 66 - col. 8, line 6) and the bezel 256 is attached to the front of housing 194 and the knee bolster is attached to the rear duct assembly 46.

Thus, contrary to the Examiner's allegations, the Lindberg et al. reference does not teach or suggest a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

Therefore, the Lindberg et al reference does not teach or suggest each and every element

of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 1-2, 5, 7-8, and 13-19.

C. The 102(e) Lorenz et al. reference rejection

Regarding the rejection of claims 7 and 9, the Examiner alleges that the Lorenz et al. reference teaches the claimed invention. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by the Lorenz et al. reference.

The Lorenz et al. reference does not teach or suggest the features of the present invention including a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the utilized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

The Lorenz et al. reference appears to disclose a central support 2 and a lower support 3 that are bonded together to form a rigid-box like transverse support (col. 4, lines 49-53). The Lorenz et al. reference further appears to disclose a pedal support block 43 which is secured by a support strap 43 to the central support 2 (col. 5, line 56 - col. 6, line 2 and Figs. 5a and 6a).

Further, the Lorenz et al. reference discloses a blower cover 4 and an instrument panel

covering 5. The blower cover 4 appears to be connected to the central support 2 (see Fig. 3 and col. 5, lines 10-25). Similarly, the instrument panel covering 5 also appears to be connected to the central support (see Fig. 1)

The Examiner alleges that the combination of the central support 2, the blower cover 4 and the instrument panel covering 5 corresponds to the claimed upper panel, that the lower support 3 corresponds to the claimed lower panel and that the pedal support block 43 corresponds to the claimed steering support beam.

In summary, the Lorenz et al. reference does not teach or suggest a unitized component that includes a blower unit fixed to the lower panel and the steering support beam. As explained above, by dividing the instrument panel into an upper panel and a lower panel, the unitized component may be assembled before installation in the vehicle and a mechanic may then easily align the ducts from the blower unit to an opening in the vehicle bulkhead and affix the blower unit to the vehicle body from the upper side of the lower panel (page 8, line 10 - page 11, line 23), rather, than from below the instrument panel as has conventionally been done.

In this manner, the present invention greatly improves the ease and accuracy of mounting the blower unit in the vehicle.

Therefore, the Lorenz et al. reference does not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection of claims 7 and 9.

III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully submit that

claims 1-12, 15-16, and 19-20, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: _____

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